

MEMO ENDORSED.**LAW OFFICE OF JEFFREY DAVIS**600 Mamaroneck Avenue, 4th Floor, Harrison, New York 10528

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August 12, 2025

BY EFILE

Case Name: Chanel, Inc. v. Taroo Second, Inc. et al**Case Number:** 1:24-cv-09038-RA-OTW

Your Honor:

I represent the Defendants in the above referenced matter.

I was notified of plaintiff's request to appear virtually. I did not make a request to appear virtually hence nothing was filed in response to Plaintiff's request. However, I had a death in the family yesterday and as such my circumstances have changed. I can appear by phone as well on August 14th provided that the conference is still scheduled for 9:30am, or I suggest we adjourn this conference for at least two weeks, preferably until after August 25th for the following reasons.

First, Defendants have provided 92 pages of documents in response to Plaintiff's demands consisting of all of the financial documents in my client's possession. As such, we have complied with Plaintiff's discovery demands to the fullest extent required. In addition, we are confirmed for a virtual deposition on August 25th as well.

On a separate note, I appreciate that an honest mistake was made back in May 28th, but for this Court to constantly re-hash that issue is neither productive nor kind. Mistakes were made and I would appreciate some latitude as I have, as is well documented, complied with each of the Court orders since, and have worked diligently to try to resolve this matter, without Plaintiff's cooperation in the least. I also respectfully remind this Court that in order to further a resolution to this matter or to bring this matter to trial (which I'm prepared to do), I am representing my client **pro bono**.

If the Court can please advise as soon as possible, I would greatly appreciate it. Furthermore please be advised that I am currently in Virginia, as such a prompt response to this request would be appreciated.

Respectfully submitted,

JEFFREY DAVIS

Application **GRANTED**. The August 14, 2025, in-person status conference is hereby **ADJOURNED to September 17, 2025, at 10:00 a.m.** The Court extends its condolences to Mr. Davis.

SO ORDERED.


Ona T. Wang
U.S.M.J. 8/12/2025